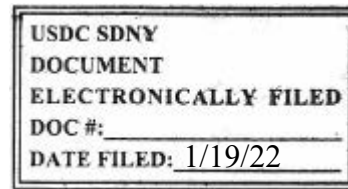


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



In re Application of Benjamin Steinmetz for  
an Order to Take Discovery from Vale S.A.,  
Vale Americas Inc., Rio Tinto plc, and Rio  
Tinto Limited pursuant to 28 U.S.C. § 1782

Case No. 20-mc-212-AJN

**~~PROPOSED~~ ORDER GRANTING MOTION OF VALE S.A. AND VALE AMERICAS  
INC. FOR LEAVE (I) TO FILE A REDACTED VERSION OF VALE’S  
MEMORANDUM OF LAW IN OPPOSITION TO THE APPLICATION OF BENJAMIN  
STEINMETZ FOR AN ORDER TO TAKE DISCOVERY PURSUANT TO 28 U.S.C.  
§ 1782 AND (II) TO FILE UNDER SEAL THE  
DECLARATION OF SAMUEL L. LEVANDER**

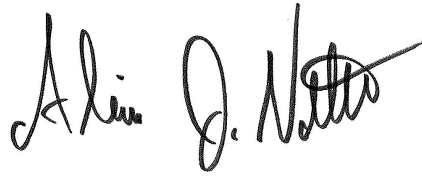
Upon the letter motion, dated June 26, 2020 (the “Motion”) of Vale S.A. and Vale Americas Inc. (collectively, “Vale”) for entry of an order authorizing Vale to file a redacted version of Vale’s Memorandum of Law in Opposition to the Application of Benjamin Steinmetz (“Steinmetz”) for an Order to Take Discovery Pursuant to 28 U.S.C. § 1782 (the “Vale MOL”) and to file the Declaration of Samuel L. Levander in Support of the Vale MOL (the “Levander Declaration”) under seal; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Vale is authorized to publicly file a redacted version of the Vale MOL and the unredacted version under seal. To the extent such unredacted version has already been filed under seal in the ECF system, it shall remain sealed. Such unredacted version of the Vale MOL shall be made available only to Vale, Steinmetz, their respective counsel and the Court.
3. Vale is authorized to file the Levander Declaration under seal. To the extent the Levander Declaration has already been filed under seal in the ECF system, it shall remain sealed.

The Levander Declaration shall be made available only to Vale, Steinmetz, their respective counsel and the Court.

Dated: January 19, ~~2020~~  
New York, New York 2022

A handwritten signature in black ink, appearing to read "Alison J. Nathan", written in a cursive style.

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THE HONORABLE ALISON J. NATHAN  
UNITED STATES DISTRICT JUDGE